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Attorney for Synergetic Staffing, LLC
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: April 29, 2020

In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, et al.,	:	Case No. 18-23538 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	

RESPONSE TO OBJECTION TO CLAIM OF SYNERGETIC STAFFING, LLC

Claimant, Synergetic Staffing, LLC (“Synergetic”), by and through its attorney of record, Robert J. Bruce, and respectfully submits the following Response to Objection of Claim.

Pursuant to the Amended Case Management Order, Synergetic states as follows:

I. NAME OF CLAIMANT AND BASIS OF CLAIM

A. Name of Claimant: Synergetic Staffing, LLC, c/o Alicia Larson, 109 East Bridge Street, Brighton, CO 80601.

B. Amount of Claim:

(i)	Principal Balance Due:	\$ 98,604.98
(ii)	Interest Due to Act, date of filing Administrative Claims	\$ 19,622.16
(iii)	Additional Interest Due to Date	\$ <u>3,573.42</u>
TOTAL		\$121,800.56

C. Basis of Claim. The claim stems from the agreement to provide temporary workers at Sears stores and/or warehouses in Colorado. The employees were provided to Sears at its request and worked under the direction of Sears' management while the company operated under Chapter 11 of the U.S. Bankruptcy Code and until the sale was completed on February 11, 2019.

II. STATEMENT AS TO WHY THE CLAIM SHOULD NOT BE DISALLOWED

The Claim should not be disallowed because (i) the temporary employees were provided based upon an agreement with the Debtor; (ii) the temporary works actually provided services for the Debtor at its locations in Colorado; and (iii) Synergetic has not been paid for the sum claimed due.

III. ADDITIONAL SUPPORTING DOCUMENTS

In addition to the documents previously provided in support of its Administrative Claim, Synergetic supplied the Court the with the Affidavit of Alicia Larson and its Exhibits, attached hereto as Exhibit A.

IV. NAMES AND ADDRESSES

A. Replies to this Objection should be sent to the following:

- (i) Robert J. Bruce, Esquire
RJB Lawyer, LLC
1543 Champa Street, Suite 400
Denver, CO 80202
Phone: 303.573.5498
E-Mail: bobbbruce@rjblawyerllc.com
- (ii) Synergetic Staffing, LLC
c/o Alicia Larson
109 East Bridge Street
Brighton, CO 80601

B. Designated Representative possessing ultimate authority to reconcile, settle or otherwise resolve the claim:

Alicia Larson
Synergetic Staffing, LLC
109 East Bridge Street
Brighton, CO 80601

Dated March 27, 2020 at Denver, Colorado.

RJB LAWYER, LLC,
Attorney for Synergetic Staffing, LLC

By: /s/ Robert J. Bruce
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